

# **Prevention of Significant Air Quality Deterioration Review**

## **Final Determination**

September 1, 2015

Facility Name: Graphic Packaging International, Inc. – Macon Mill

City: Macon

County: Bibb

AIRS Number: 04-13-021-00001

Application Number: 23156

Date Application Received: March 11, 2015



State of Georgia  
Department of Natural Resources  
Environmental Protection Division  
Air Protection Branch

Karen Hays – Chief, Air Protection Branch

Stationary Source Permitting Program

Eric Cornwell  
David Matos  
Chan Spraley

Planning & Support Program

Di Tian  
Henian Zhang

## BACKGROUND

On March 11, 2015, Graphic Packaging International, Inc. – Macon Mill (hereafter GPI) submitted an application for an air quality permit to increase actual production of the No. 1 Paper Machine, the Recycle Mill, and other equipment at the Macon Mill. The facility is located at 100 Graphic Packaging International Way in Macon, Bibb County. The proposed project will modify the No. 1 Paper Machine, Recycle Mill, and associated emission units, and install and operate a new high density (HD) pulp storage tank. GPI – Macon Mill is anticipating that the overall project will result in the additional production of 42,000 air dried tons of finished paper (ADTFP) per year from the No. 1 Paper Machine. It is important to note that the proposed project does not alter the design capacity of the No. 1 Paper Machine, but allows the machine to meet more stringent quality standards in place for certain European customers.

On July 16, 2015, the Division issued a Preliminary Determination stating that the modifications described in Application No. 23156 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the modified equipment.

The Division requested that GPI place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in *The Macon Telegraph* (legal organ for Bibb County) on July 30, 2015. The public comment period expired on August 31, 2015.

During the comment period, comments were received from the facility to provide clarification and correct typographical errors.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

**Graphic Packaging International, Inc. – Macon Mill COMMENTS**

Comments were received from Chris Pool, Consultant at Trinity Consultants on behalf of Graphic Packaging International, Inc. – Macon Mill, by email on August 12, 2015.

**Comment 1**

Condition 6.1.7.d.xi requires the identification of any time the No. 1 Paper Machine does not comply with the tune-ups outlined in Condition 3.3.3, 4.2.17, and 5.2.13 in the required compliance reports. Condition 3.3.3 specifies the annual capacity factor requirement for the No. 3 Recovery Boiler. We believe that EPD intended for the condition to specify anytime that GPI does not comply with the tune-ups as outlined in 3.3.40, 4.2.17, and 5.2.13. GPI requests that Condition 6.1.7.d.xi reference Condition 3.3.40 in place of Condition 3.3.3.

**EPD Response.**

EPD agrees with the comment and changes have been made to Condition 6.1.7.d.xi to reference Condition 3.3.40 in place of Condition 3.3.3.

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a – c. [Unchanged]

- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

**No. 1 Paper Machine**

- x. Any time of process operation during which the No. 1 Paper Machine dryer burners are fired with a fuel other than natural gas.  
[40 CFR 52.21(j)]
- xi. Any time in which the No. 1 Paper Machine does not comply with the tune-ups outlined in Condition 3.3.40, 4.2.17, and 5.2.13.  
[40 CFR 52.21(j)]

**Comment 2**

Condition 6.2.52 requires records to be maintained on the work performed on the No. 1 Paper Machine during annual tune-ups required by Condition 3.3.40. Condition 3.3.40 requires tune-ups to be performed every 24 months. GPI requests that new Condition 6.2.52 require records be maintained for the tune-ups that are required every 24 months.

**EPD Response.**

EPD agrees with the comment and changes have been made to Condition 6.2.52 to omit “annual” from the condition.

- 6.2.52 The Permittee shall maintain records of work performed on the No. 1 Paper Machine during the tune-ups required by Condition 3.3.40. These records shall be included in the report required by Condition 6.1.4 during the calendar quarter that the tune-up is performed.  
[40 CFR 52.21(j)]

**EPD CHANGES**

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a – c. [Unchanged]

- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

No. 1 Paper Machine

- x. Any time of process operation during which the No. 1 Paper Machine dryer burners are fired with a fuel other than natural gas.  
[40 CFR 52.21(j)]

- xi. Any time in which the No. 1 Paper Machine does not comply with the tune-ups outlined in Condition 3.3.40, 4.2.17, and 5.2.13.  
[40 CFR 52.21(j)]

- 6.2.52 The Permittee shall maintain records of work performed on the No. 1 Paper Machine during the tune-ups required by Condition 3.3.40. These records shall be included in the report required by Condition 6.1.4 during the calendar quarter that the tune-up is performed.  
[40 CFR 52.21(j)]

# **APPENDIX A**

## **AIR QUALITY PERMIT**

**Amendment No. 2631-021-0001-V-04-2**

## **APPENDIX B**

### **WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD**